

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

DKK/LB/CJN F. #2017R05903

271 Cadman Plaza East Brooklyn, New York 11201

February 15, 2022

## By Email and ECF

Thomas C. Green Mark D. Hopson Michael A. Levy Brian J. Stretch Douglas A. Axel Melissa Colon-Bosolet Sidley Austin LLP

David Bitkower Matthew S. Hellman Matthew D. Cipolla Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-3) (AMD)

## Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

## I. <u>The Government's Discovery</u>

<b>Document Description</b>	Category of Discovery Pursuant to Protective Order	Bates Range
Documents provided by a Third Party. <sup>1</sup>	Sensitive Discovery Material	DOJ_HUAWEI_A_0111401626 – DOJ_HUAWEI_A_0111404357
Documents provided by a Third Party.	Discovery Material	DOJ_HUAWEI_A_0111404358 – DOJ_HUAWEI_A_0111405141

Very truly yours,

CAROLYN POKORNY

Attorney for the United States,

Acting Under Authority Conferred by 28

U.S.C. § 515

Eastern District of New York

By: /s/ David Kessler

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DEBORAH L. CONNOR

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By: /s/ Laura Billings

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Christian J. Nauvel

**Trial Attorneys** 

<sup>&</sup>lt;sup>1</sup> "Third Party" refers to the individual identified in the government's November 17, 2021, letter to defense counsel.

JAY I. BRATT

Chief, Counterintelligence and Export

Control Section

National Security Division, U.S. Department

of Justice

/s/ David Lim David Lim By:

R. Elizabeth Abraham

Trial Attorneys

Clerk of the Court (AMD) (by ECF) (without Enclosures) cc: